

**COMMONWEALTH OF MASSACHUSETTS**  
**before the**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**Western Massachusetts ) D.T.E. 99-101**

**Electric Company )**

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## **The Attorney General's First Set of Information Requests**

### **INSTRUCTIONS**

- These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Western Massachusetts Electric Company or its affiliates or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other

services in connection with this proceeding.

- Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
- If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
- These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
- Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
- Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
- For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
- If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
- If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the

unanswered portions.

- If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
- If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
- Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
- If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
- Each request for information includes a request for all documentation which supports the response provided.
- Provide three copies of each response.
- The term "Company" refers to Western Massachusetts Electric Company and/or its affiliates. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
- Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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# **The Attorney General's First Set of Information Requests**

AG-1-1 Please provide all data, calculations, workpapers, and assumptions supporting the Hagler-Bailly Market Price forecasts used in preparing Exhibit 2. Include a step-by-step narrative of how the estimates were developed, the date the forecasts were prepared and what use were the forecasts designed for (who requested the forecast and what were the specifics of the request).

AG-1-2 Have the Hagler-Bailly Market Price Forecasts been adopted in any regulatory proceeding? If yes, please provide the relevant orders or other accepting documents. These documents must fully explain the situations to which these forecasts were to be applied; if the official authorizations do not provide a full explanation, please provide the necessary details. Include a description of the differences between Hagler-Bailly Market Price Forecasts adopted by regulators and the forecasts used in Exhibit 2.

AG-1-3 Please provide all data, calculations, workpapers, and assumptions supporting the 9.03 per cent discount rate used in the Company's present value calculations in Exhibit 2.

AG-1-4 Please provide the monthly purchases under the Company's contract with MASSPOWER since June 1991. Include the kWhs purchased, the energy charges, and the capacity charges for each month.

AG-1-5 During the period that the MASSPOWER contract has been in effect has the Company had any disputes with MASSPOWER? If yes, please describe and explain how each dispute was resolved. Include the notification dates and the resolution dates.

AG-1-6 Please provide itemized estimates of all transaction costs associated with the termination of the MASSPOWER contract that the Company will seek to recover through rates. Include a description of each item, note whether or not it is an allocated expense-- provide the allocation basis, a directly assigned expense or an "outside-services" expense.

AG-1-7 Please provide a computation of any mitigation incentive the Company will receive as the result of the termination of the MASSPOWER contract under each of the Exhibit 2 case scenarios. Include all calculations, workpapers and assumptions.

AG-1-8 Please provide the basis for the 6.25 per cent interest rate for securitized debt that the Company assumed in its economic analyses of the buyout contained in Exhibit 2. Include all calculations, workpapers and assumptions. In addition, provide the interest rates on securitized utility financings since January 1, 1998--identify the utility and the amount securitized.

AG-1-9 Please describe how the termination of the MASSPOWER contract will be reflected in the Company's calculation of its transition charge. Include an illustrative "Schedule 13" marked up to indicate the specific items that have been changed by incorporating the effects of the buyout and an explanation of how and when the transition charge calculations will be affected.

AG-1-10 Has any other contract purchaser of MASSPOWER's output renegotiated or terminated its contract(s)? If yes, please provide the conditions and copies any regulatory approvals related to the new contracts or the terminations.

AG-1-11 Please provide the average monthly ISO-NE market clearing price for energy and capacity from May 1999 through November 1999. Include all calculations, workpapers and assumptions.

AG-1-12 Since March 1998, has the Company used the MASSPOWER output to serve its customers? If yes, what cost has the Company used in determining the price to be charged its customers. If no, please explain how the Company has disposed of the output. Include the monthly revenues received for each component--capacity and energy, the amount of energy and capacity sold to each individual purchaser, and indicate whether the sales were made under contract or were opportunity sales. If sales were made under contract, please provide copies of the contracts governing the sales.

AG-1-13 Based on the Company's recent successfully completed Standard Offer/Default Service auction, please recalculate Exhibit 2 by substituting the winning bid price for the Hagler-Bailly forecast price.

AG-1-14 Since March 1, 1998 has the Company made any spot or short-term purchases to serve its Standard Offer/Default Service load? If yes, please provide the volumes purchased each month, the prices paid and the pricing terms governing these purchases.

Dated: December 16, 1999